

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

UNITED STATES OF AMERICA	)	
	)	CRIMINAL NO. 2:19cr47
v.	)	
	)	
DAVID ALCORN,	)	
	)	
AGHEE WILLIAM SMITH II, &	)	
	)	
THOMAS L. BARNETT,	)	
	)	
Defendants.	)	

DECLARATION OF INSPECTOR JASON W. THOMASSON

I, Jason W. Thomasson, do hereby affirm:

1. I am a Postal Inspector with the United States Postal Inspection Service. I have been a Postal Inspector for almost ten years.

2. I am one of the case agents assigned to the investigation and prosecution of defendants David Alcorn, Aghee William Smith II, and Thomas L. Barnett (the “defendants”). As such, I have been involved with contacting the government’s witnesses, serving subpoenas on them, interviewing them, and assisting in preparing them for trial.

3. The following information is either, as noted, based on my personal knowledge or my discussions with the other case agents involved in the investigation and prosecution.

4. On September 28, 2021, Special Agent Andrew Bowers with the Internal Revenue Service, Criminal Investigations, contacted witness V.H. by phone.

5. V.H. told S/A Bowers that she lives in Antelope, California, and is 73 years old. She lives with her husband, S.H., who is legally blind and in the early stages of dementia.

6. The government informed V.H. that the government was serving her with a subpoena to attend and testify at the November 16, 2021, trial of the defendants in Norfolk, Virginia. V.H. stated she was not able to travel to Norfolk for the trial. She is the sole caretaker of her husband, S.H., and there is no one else available to assist. In addition, in part due to her advanced age, she was unable to travel to Norfolk during the COVID-19 pandemic due to the increased risk of serious health complications she would face if infected.

7. On November 4, 2021, I personally met V.H. I can verify that S.H. appeared to have vision problems, used a cane to assist him with walking, and appeared unable to care for himself without V.H.'s assistance.

8. V.H. was deposed in Sacramento, California, on November 5, 2021. V.H. was unable to drive to the deposition. Therefore, law enforcement picked her and S.H. up at their residence and drove them to the U.S. Attorney's Office in Sacramento for the deposition.

9. Defendant Aghee William Smith II and his attorney were physically present and participated in the deposition. The other defendants participated virtually through counsel.

10. Law enforcement drove V.H. and S.H. back to their residence after the conclusion of the deposition.

11. On September 23, 2021, Special Agent Jennifer Collins with the Federal Bureau of Investigation contacted witness S.B. by phone.

12. S.B. told S/A Collins that she lives in Citrus Heights, California, and is 81 years old. She medically retired from working at a telephone company due to a complete mental breakdown. She continues to have extreme, crippling anxiety that makes her unable to travel.

13. SA Collins informed S.B. that the government was serving her with a subpoena to attend and testify at the November 16, 2021, trial of the defendants in Norfolk, Virginia. S.B.

stated she was not able to travel to Norfolk for the trial. She is 81 years. Further, her extreme anxiety prevents her from traveling. In addition, in part due to her advanced age, she was unable to travel to Norfolk during the COVID-19 pandemic due to the increased risk of serious health complications she would face if infected.

14. On November 5, 2021, I personally met S.B. I can verify that S.B. has limited mobility and appeared extremely anxious.

15. S.B. was deposed in Sacramento, California, on November 5, 2021. S.B. was unable to drive to the deposition. Therefore, law enforcement picked S.B. up at her residence and drove her to the U.S. Attorney's Office in Sacramento for the deposition.

16. Defendant Aghee William Smith II and his attorney were physically present and participated in the deposition. The other defendants participated virtually through counsel.

17. Law enforcement drove S.B. back to her residence after the conclusion of the deposition.

18. On October 22, 2021, S/A Bowers and Assistant United States Attorney Elizabeth M. Yusi contacted witness K.S. via the telephone.

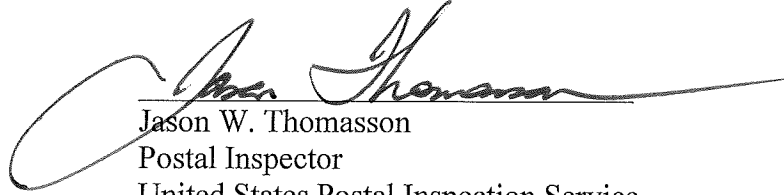
19. K.S. lives in El Dorado Hills, California, and is 64 years old.

20. S/A Bowers informed K.S. that the government was serving him with a subpoena to attend and testify at the November 16, 2021, trial of the defendants in Norfolk, Virginia. K.S. stated he was not able to travel to Norfolk for the trial. He is 64 years old and due to his age is in a higher risk category should he contract COVID-19. He also suffers from extreme vertigo which prevents him from flying. In addition, his wife recently was in an accident and was severely injured. He is the sole caretaker of his wife at this time, and there is no one else available to assist. For these reasons, K.S. is unable to travel to Norfolk.

21. K.S. was deposed in Sacramento, California, on November 5, 2021.

22. Defendant Aghee William Smith II and his attorney were physically present and participated in the deposition. The other defendants participated virtually through counsel.

I declare the previous information to be true to the best of my knowledge and belief.



Jason W. Thomasson  
Postal Inspector  
United States Postal Inspection Service